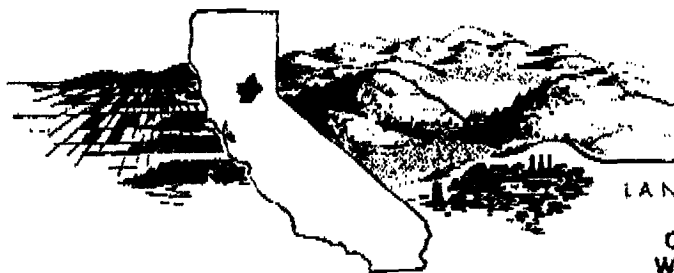


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Butte County

LAND OF NATURAL WEALTH AND BEAUTY

OFFICES OF AGRICULTURAL COMMISSIONER
WEIGHTS AND MEASURES • WATER DIVISION
316 NELSON AVENUE • OROVILLE, CALIFORNIA 95965-3318
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RICHARD B. PRICE
Agricultural Commissioner/
Director of Weights and Measures/
Water Division

LOUIE R. MENDOZA, JR.
Assistant Agricultural Commissioner/
Weights and Measures/Water Division

June 16, 1998

Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: Draft Programmatic EIS/EIR (PEIS)

Dear Mr. Snow:

The CALFED Bay-Delta Program released their Draft Programmatic EIS/EIR (PEIS) for public review on March 16, 1998. The program is seeking public input on potential solutions to the environmental and water management problems of the California Bay-Delta system as outlined in this draft document. The public review period is currently scheduled to end on July 1, 1998.

INTRODUCTION AND BACKGROUND

The Northern California Sacramento Valley CALFED Advisory Group is a grassroots coalition of local government representatives and various stakeholders from seven northern Sacramento Valley counties. This group includes representative from nearly every facet of water use from the counties of Butte, Colusa, Glenn, Shasta, Sutter, Tehama, and Yolo. This group, deemed the "Seven County Coalition", has developed three position papers outlining specific recommendations to CALFED through the formation of sub committees of the entire group. The Board of Supervisors from all seven counties formally approved these three position papers in either March or April 1997. In addition, various water districts and other water-related groups from throughout the seven counties supported the position papers.

On May 1, 1997 these position papers were summarized and submitted to you and other CALFED representatives at a public meeting held in Corning, California. In addition, on July 7, 1997 on behalf of the group, Dan Keppen, Water Resources Engineer from Tehama County Public Works, requested a written response to the position papers and recommendations to CALFED from your program. Your reply letter of July 26, 1997

gave an overview of the intended approach to be taken by CALFED with regard to the position papers submitted by the Seven County Coalition. However, with the passage of time and with the release of the draft PEIS, the Seven County Coalition requests that you provide a more specific response to their concerns at this time.

Representatives from the Seven County Coalition testified at the CALFED public hearings held in Chico, Redding and Yuba City. At those meetings, these representatives stated that the concerns expressed in the position papers are still relevant to this group and need to be addressed by your program. The following document is a summary of the position papers and will serve as the comments presented by this group for your review and incorporation into the program solution.

Due to the nature of the draft programmatic PEIS and the magnitude of the projects proposed, it is difficult to identify and comment upon specific impacts the PEIS may have upon these entities with regard to these issues. This document delineates the issues presented in the attached position papers so that the CALFED program may properly address the concerns of the Coalition. We request that each of the comments in the three papers be answered again more explicitly in light of the information presented in the draft PEIS.

POSITION PAPERS SUMMARY

Representatives from the Seven County Coalition membership volunteered to serve on sub-committees addressing three areas of concern; Storage and Conveyance, Groundwater and Flood Management. Each sub-committee generated a position paper through a cooperative effort of the sub-committee members. The following list is a summary of the pertinent points discussed in the position papers

Storage and Conveyance

1. CALFED must construct facilities for upstream storage of surface water in the Sacramento Valley.
2. The CALFED conveyance scheme should include the extension/expansion of the existing Tehama Colusa Canal system

Groundwater

3. The CALFED preferred alternative should propose actions that will effectively address the water supply problems of the entire state, rather than the more limited scope defined by Bay-Delta issues.
4. Conjunctive use definitions and programs proposed in the current CALFED planning process must prove to be reliable and consistent upon actual implementation.

5. Upstream storage of surface water on the west side of the northern Sacramento Valley must be constructed before implementing a statewide "conjunctive use" program that proposes to evacuate and export local groundwater during dry years.
6. CALFED must assure northern Sacramento Valley water users that their proposed groundwater programs will adhere to local groundwater management plans, monitoring programs, and city and county groundwater ordinances.
7. CALFED and DWR must assess the combined impact of all proposed groundwater substitution, groundwater banking or conjunctive use programs on the northern Sacramento Valley.
8. Potential impacts from the proposed additional groundwater extraction programs that must be assessed by CALFED include:
 - A. Subsidence
 - B. Permanent decline of groundwater levels (mining)
 - C. Surface water/groundwater interaction and the impacts to surface supplies (i.e. Sacramento River and its tributaries)
 - D. Decline in groundwater quality.
 - E. Significant drop in summer groundwater levels
9. All potential impacts should be evaluated by factoring into the assessment the importance of ultimate water needs, existing water rights, and the Area of Origin priority of northern Sacramento Valley counties.

Flood Management

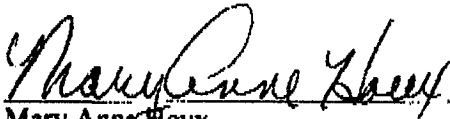
10. CALFED solutions should provide flood control enhancement through the development of new storage, coordinated management and operations for proposed facilities. In addition, there should be improved re-operation and maintenance of existing storage reservoirs and flood control projects.
11. CALFED must construct upstream storage of surface water in the Sacramento Valley, with attendant flood control features.
12. The carrying capacity of existing flood control channels must be maintained and/or improved through the CALFED program.
13. The impacts associated with the development of setback levees must be closely scrutinized by CALFED.
14. CALFED agencies must develop assurances or a "safe harbor" program with regard to endangered or exotic species that will encourage landowners to participate in the development of habitat enhancement programs.

15. Northern Sacramento Valley landowners and businesses must be assured that CALFED funded ecosystem restoration efforts will not threaten essential facilities at critical locations

CONCLUSION

It is our belief that the program as depicted in the PEIS represents unacceptable impacts to the people and economy of these seven northern Sacramento Valley counties as outlined in the attached position papers summarized above. The Seven County Coalition is concerned with the protection of its citizenry and environment and the preservation of agriculture and other industries. In addition, the Board of Supervisors representing these seven counties has been charged with the public safety of their residents and the maintenance of property and water rights that may be impacted by the CALFED Program. Therefore, the Coalition respectfully requests that CALFED respond to the attached concerns summarized above. If the CALFED Bay-Delta Program is truly seeking local input, they should honor this request and incorporate them into the CALFED Bay-Delta solution.

Respectfully Submitted,



Mary Anne Houx
Supervisor, Butte County

Tricia Clark
Supervisor, Shasta County

Dick Akin
Supervisor, Sutter County

Lynnel Pollock
Supervisor, Yolo County

Enclosure

NOTE:

Due to multiple faxings, the text on the signature page of the letter is difficult to read. Though all the signatures are not on this page, it has been included so that the text can be read.

Complete signature page follows.

13. Northern Sacramento Valley landowners and businesses must be assured that CALFED limited ecosystem restoration efforts will not threaten essential facilities at critical locations.

CONCLUSION

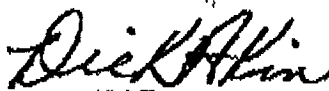
It is our belief that the program as depicted in the DEIS represents unacceptable impacts to the people and economy of these seven northern Sacramento Valley counties as outlined in the attached problem papers summarized above. The Seven County Coalition is concerned with the protection of its citizenry and environment and the preservation of agriculture and other industries. In addition, the Board of Supervisors representing these seven counties has been alarmed with the public safety of their residents and the maintenance of property and water rights that may be impacted by the CALFED Program. Therefore, the Coalition respectfully requests that CALFED respond to the attached concerns summarized above. If the CALFED Bay-Delta Program is truly seeking local input, they should honor this request and incorporate them into the CALFED Bay-Delta solution.

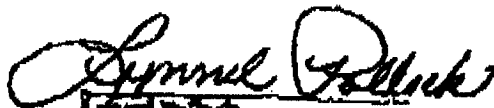
Respectfully Submitted,



Mary Ann Gandy
Supervisor, Butte County


Patricia A. "Trish" Clarke
Supervisor, Shasta County


Dick Allen
Supervisor, Sutter County


Lynne Pollock
Supervisor, Yolo County

Enclosure